



MICHAEL P. LOWRY, ESQ.
Nevada Bar No. 10666
E-mail: Michael.Lowry@wilsonelser.com
NICHOLAS F. ADAMS, ESQ.
Nevada Bar No. 14813
E-mail: Nicholas.Adams@wilsonelser.com
6689 Las Vegas Boulevard South, Suite 200
Las Vegas, NV 89119
Tel: 702.727.1400/Fax: 702.727.1401
Attorneys for LVGV, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Ann Marie Reynolds,

Plaintiff,

vs.

LVGV, LLC dba The M Resort Spa and Casino, a
Domestic Limited-Liability Company; The Burks
Companies, Inc., a Georgia Corporation; Does I-X,
inclusive; and Roe Corporations I-X, inclusive

Defendants.

Case No.: 2:24-cv-00948-ART-DJA

**STIPULATED DISCOVERY PLAN
AND SCHEDULING ORDER;
SUBMITTED IN COMPLIANCE
WITH LR 26-1(b)**

1. **Meeting:** The parties conducted the Rule 26(f) conference on May 21, 2024.
2. **Pre-Discovery Disclosures:** The parties have not yet served their Rule 26(a)(1) disclosures.
3. **Discovery Plan:** The parties propose the discovery period below, calculated from the removal petition filed May 21, 2024.

	Default Schedule
Amending the Pleadings and Adding Parties	August 19, 2024
Initial Expert Disclosures	September 17, 2024
Rebuttal Expert Disclosures	October 17, 2024
Discovery Closes	November 15, 2024
Dispositive Motions	December 16, 2024
Pre-Trial Order, if no Dispositive Motions	January 15, 2025

1 The parties certify that they have conferred about the possibility of using alternative dispute
2 resolution processes, but concluded they are not mutually beneficial at this time. The parties also
3 considered consent to trial by a magistrate judge and the use of the Short Trial Program. Further,
4 the parties have discussed electronic evidence, but to date have no electronic evidence to present.

5 Dated: May 30, 2024



THE 702 FIRM INJURY ATTORNEYS

8

9 /s/ Nicholas F. Adams, Esq.

10 Michael P. Lowry, Esq.
11 Nevada Bar No. 10666
Nicholas F. Adams, Esq.
Nevada Bar No. 14813
Attorneys for LVGV, LLC

/s/ Matt Pawlowski, Esq.

Matthew P. Pawlowski, Esq.
Nevada Bar No. 9889
Attorneys for Ann Reynolds

12 **THORNDAL ARMSTRONG, P.C.**

13

14 /s/ Michael Hetey, Esq.

15 Michael C. Hetey, Esq.
Nevada Bar No. 5668
Attorneys for The Burks Companies, Inc.

16

17 **IT IS SO ORDERED.**

18 DATED: 5/31/2024

19 

20 DANIEL J. ALBRECHTS
21 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

Pursuant to FRCP 5, I certify that I am an employee of Wilson Elser Moskowitz Edelman & Dicker LLP, and that on May 30, 2024, I served the **STIPULATED DISCOVERY PLAN AND SCHEDULING ORDER; SUBMITTED IN COMPLIANCE WITH LR 26-1(b)** as follows:

- ☐ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;
- ☒ via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk;

THE702FIRM INJURY ATTORNEYS
8335 W. Flamingo Road
Las Vegas, NV 89147
Attorneys for Ann Reynolds

THORNDAL ARMSTRONG, P.C.
600 S. Las Vegas Blvd., Suite 400
Las Vegas, NV 89101
Attorneys The Burks Companies, Inc.

BY: /s/ Joyce L. Radden
An Employee of



Radden, Joyce L.

From: Adams, Nicholas
Sent: Wednesday, May 29, 2024 5:23 PM
To: Michael C. Hetey; Matt Pawlowski
Cc: Lara M. Feldstein; Jennifer Hodge; Alisha Watson
Subject: RE: Reynolds v. LVGV, LLC, et. al. 5.29.24 re: response to proposed Joint Status Report and Stipulated Discovery Plan / Scheduling Order

Follow Up Flag: Follow up
Flag Status: Flagged

Sorry about the signature block I will fix that before submitting.

Thanks,

Nicholas Adams
Attorney At Law
Wilson Elser Moskowitz Edelman & Dicker LLP
6689 Las Vegas Blvd. South, Suite 200
Las Vegas, NV 89119
702.727.1235 (Direct)
702.727.1400 (Main)
702.727.1401 (Fax)
nicholas.adams@wilsonelser.com

From: Michael C. Hetey <mch@thorndal.com>
Sent: Wednesday, May 29, 2024 10:34 AM
To: Adams, Nicholas <Nicholas.Adams@wilsonelser.com>; Matt Pawlowski <Matt@the702firm.com>
Cc: Lara M. Feldstein <lmf@thorndal.com>; Jennifer Hodge <jxh@thorndal.com>; Alisha Watson <amw@thorndal.com>
Subject: RE: Reynolds v. LVGV, LLC, et. al. 5.29.24 re: response to proposed Joint Status Report and Stipulated Discovery Plan / Scheduling Order

EXTERNAL EMAIL This email originated from outside the organization.

If you can kindly change that to be my name for my e-signature it would be appreciated.

For the draft Stipulated Discovery Plan and Scheduling Order, that is acceptable

Let me know if you have any questions. Thanks.

Sincerely,

Michael C. Hetey | Shareholder | Thorndal Armstrong, PC

PLEASE NOTE OUR NEW ADDRESS

600 S. Las Vegas Blvd., Suite 400 | Las Vegas, NV 89101

Phone: (702) 366-0622 | Facsimile: (702) 366-0327 | Cell: (702) 860-8343

mch@thorndal.com

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From: Adams, Nicholas <Nicholas.Adams@wilsonelser.com>

Sent: Wednesday, May 29, 2024 9:30 AM

To: Michael C. Hetey <mch@thorndal.com>; Matt Pawlowski <Matt@the702firm.com>

Cc: Lara M. Feldstein <lmf@thorndal.com>; Jennifer Hodge <jxh@thorndal.com>; Alisha Watson <amw@thorndal.com>

Subject: RE: Reynolds v. LVGV, LLC, et. al.

Hi Michael,

Just following up to see if you had a chance to review.

Best,

Nicholas Adams
Attorney At Law
Wilson Elser Moskowitz Edelman & Dicker LLP
Las Vegas, NV 89119
702.727.1235 (Direct)
702.727.1400 (Main)
702.727.1401 (Fax)
nicholas.adams@wilsonelser.com

From: Michael C. Hetey <mch@thorndal.com>

Sent: Friday, May 24, 2024 12:57 PM

To: Matt Pawlowski <Matt@the702firm.com>

Cc: Adams, Nicholas <Nicholas.Adams@wilsonelser.com>; Lara M. Feldstein <lmf@thorndal.com>; Jennifer Hodge <jxh@thorndal.com>; Alisha Watson <amw@thorndal.com>

Subject: Re: Reynolds v. LVGV, LLC, et. al.

EXTERNAL EMAIL This email originated from outside the organization.

I will review and reply asap.

Sincerely,

Michael C. Hetey | Shareholder

Thorndal Armstrong, PC

PLEASE NOTE OUR NEW ADDRESS

600 S. Las Vegas Blvd.,

Suite 400

Las Vegas, NV. 89101

Phone: [\(702\) 366-0622](tel:(702)366-0622)

Fax: [\(702\) 366-0327](tel:(702)366-0327)

Cell: (702) 860-8343

mch@thorndal.com

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On May 24, 2024, at 12:53 PM, Matt Pawlowski <Matt@the702firm.com> wrote:

Hi Nicholas -

Both are approved as to form and content for my e-signature, pending approval from other counsel.

Thank you and have a great day,

Matthew P. Pawlowski, Esq.

Senior Associate Attorney

THE702FIRM Injury Attorneys

Direct Dial: 702-224-2049

E-mail: Matt@the702firm.com

From: Adams, Nicholas <Nicholas.Adams@wilsonelser.com>

Sent: Friday, May 24, 2024 11:41 AM

To: Matt Pawlowski <Matt@the702firm.com>; Michael C. Hetey <mch@thorndal.com>

Subject: Reynolds v. LVGV, LLC, et. al.



IRONSCALES couldn't recognize this email as this is the first time you received an email from this sender
Nicholas.Adams@wilsonelser.com

Hi all,

Since this case is removed, we took the liberty of preparing the joint status report and the proposed discovery plan.

Let me know if we have your permission to submit.

Best,

Nicholas Adams
Attorney At Law
Wilson Elser Moskowitz Edelman & Dicker LLP
Las Vegas, NV 89119
702.727.1235 (Direct)
702.727.1400 (Main)
702.727.1401 (Fax)
nicholas.adams@wilsonelser.com

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For further information about Wilson, Elser, Moskowitz, Edelman & Dicker LLP, please see our website at www.wilsonelser.com or refer to any of our offices.

Thank you.